

4/17/87
LP.-NB: Liquid Engineering ^{likely} to
9th Ave. on other Martell site

1/17/87 CC
1/17/87
F.6
COPY



ACME STEEL COMPANY

January 7, 1987

US EPA RECORDS CENTER REGION 5



407559

Mr. Joseph DeVuono
Waste Management Division
U.S. EPA - Region V
230 S. Dearborn Street
Chicago, IL 60604

Re: Sites Connected with Steve Martell -
Northeast Illinois and Northwest Indiana

Ms. Swales
Dear Mr. DeVuono:

This is to confirm telephone conversations with you and our attorney, Mr. James T. Harrington, and with Mr. Fred Krikau with respect to the request for information (on the above-identified sites) forwarded to Mr. F. C. Langenberg, "President of Interlake Steel Company", by Mr. Constantelos' letter dated October 17, 1986. To correct a misnomer, there is not any company named "Interlake Steel Company" associated with us. I am responding on behalf of Acme Steel Company.

As background information, the following information is provided with respect to predecessor corporate entities which now operate facilities in the State of Illinois and may be relevant to your inquiry for various periods.

- a. Acme Steel Company, an Illinois corporation, owned and operated the steel plant at Riverdale and certain other plants prior to December 1964.
- b. Interlake Iron Corporation, a New York corporation, owned and operated coke and blast furnace plants in Chicago in 1964 and before.
- c. Acme Steel Company merged into Interlake Iron Corporation in 1964, and Interlake Iron Corporation's name was changed to "Interlake Steel Corporation". From and after that date, Interlake Steel Corporation owned and operated the facilities previously operated by the two companies.
- d. In 1970, Interlake Steel Corporation merged into Interlake, Inc., a newly formed Delaware corporation; from that point until the restructuring in 1986, all of the facilities mentioned were operated by Interlake, Inc.
- e. The former businesses of Interlake, Inc. were restructured in May/June 1986 such that they are now owned by two totally separate and independent corporations - "Acme Steel Company" and "The Interlake Corporation". Interlake, Inc. was renamed "Acme Steel Company" in 1986 and presently operates the coke, iron, steel and U.S. steel strapping portions of the businesses formerly conducted under the name "Interlake, Inc.". The Interlake Corporation is a holding company which, through subsidiaries, is involved in the remainder of the businesses formerly conducted by Interlake, Inc.

January 7, 1987

Pursuant to the telephone conversations mentioned above, I understand the companies had an extension until January 9, 1987, to respond to the letter and, more specifically, to respond to that portion of the letter requesting information on U.S. Scrap and the Penn Central Site. I understand further that additional time would be available to respond to the balance of the request as necessary.

Based on the above explanation, the Interlake Corporation will supply its own response. As stated, this response is made only on behalf of Acme Steel Company.

A search of existing available records has been made and this search has produced no records of any dealings with the sites named, U.S. Scrap Corporation and Penn Central Corporation.

With respect to your request, the following is a point by point response. In making this response, we have construed your request to deal with hazardous waste as that term is defined in current regulations under the Resource Conservation and Recovery Act.

* * * * *

- 12/16/87*
1. Provide copies of all shipping documents, or other business documents including receipts, and contracts relating to the transportation, storage and/or disposal of waste materials or substances at any of the sites listed in the Attachment."

RESPONSE:

- A. The following documents dealing with Liquid Engineering Corp. have been located and copies are attached:

- (1) Invoice No. 10893 (dated 12/19/74) with attached Liquid Engineering Corp. Pick-Up Receipt 1927 (dated 12/14/74) with attached Payment Authorization (undated).
- (2) Invoice No. 10910 (dated 12/26/74) with two (2) attached Liquid Engineering Pick-Up Receipts (dated 12/22/74) with attached Payment Authorization (dated 1/10/75).
- (3) Liquid Engineering Corp. Invoice No. 11108 (dated 1/31/75) with attached Payment Authorization (dated 2/25).
- (4) Liquid Engineering Corporation Invoice No. 11183 (dated 2/28/75) with attached Payment Authorization (dated 3/25).
- (5) Liquid Engineering Corp. Invoice No. 11293 (dated 3/25/75) with attached Liquid Engineering Corp. Pick-Up Authorization No. 1541 (dated 3/12/75) and attached Payment Authorization (dated 4/10).
- (6) Liquid Engineering Corp. Invoice No. 11632 (dated 6/13/75) with attached Payment Authorization (dated 6/25).
- (7) Liquid Engineering Corp. Invoice No. 11892 (dated 7/21/75) with attached Payment Authorization (dated 8/10).



ACME STEEL COMPANY

The above invoices relate to the collection of waste oils from water pollution control equipment and materials from the cleaning of a lime storage tank and are not believed to have related to hazardous wastes as that term is defined in the Resource Conservation and Recovery Act.

B. The following documents dealing with Paxton Landfill Corporation have been located and copies are attached:

- (1) Interlake, Inc. Purchase Order No. 21-72108-00 (dated 1/11/78).
- (2) Interlake, Inc. Purchase Order No. 21-72235-78 (dated 1/6/79).
- (3) Interlake, Inc. Purchase Order No. 21-72497 (dated 1/9/80).

All of the above were blanket purchase orders for the delivery of waste oil to Paxton Landfill Corporation. The records do not indicate that any shipments of such waste oil were, in fact, made. Any waste oil covered by these purchase orders would not, in the company's opinion, constitute hazardous waste as that term is defined under the Resource Conservation and Recovery Act.

C. The following document dealing with Paxton Landfill Corporation was located and a copy is attached.

- (1) Paxton Landfill Corporation Invoice No. 5773 (dated 1/31/77) with attached Payment Authorization for "sludge for the Month of January, 1977 - 18,000 gallons."

The above invoice is believed to relate to sludge (principally waste iron oxides "millscale") from sand filters for the treatment of water at the Riverdale steel manufacturing plant. This material is not a hazardous waste as that term is defined in the Resource Conservation and Recovery Act.

The foregoing constitutes all records which the company has been able to locate pertaining to any of the sites identified in the Attachment. It should be noted that due to the period of time that your request covers, and the multiple reorganizations of the companies which have occurred during this period, complete records are not available to cover the entire period. The only records available, records after 1974 in the Record Retention Department of the company and from as early as the mid-60's in its Purchasing Department, were located and examined. If other pertinent records are located, they will be reviewed and the information provided to you.

* * * * *

- "2. Provide copies of all shipping documents or other business documents including receipts, and contracts, relating to the transportation, storage and/or disposal of waster materials or substances by business organizations related to Steve Martell or the sites connected with Steve Martell. (See Attachment)."



ACME STEEL COMPANY

January 7, 1987

- "3. Identify and describe all business transactions with Mr. David Head, former Secretary-Treasurer for U.S. Scrap Corporation and/or Steve Martell, relating to the transportation, storage and/or disposal of waste materials or substances at the sites listed in the Attachment."
- "4. Describe what you requested and/or received from Mr. Martell, Mr. Head, or from any of the business organizations regarding the ultimate disposal location of your waste materials? (See Attachment.)"
- "5. Provide the generic, common or trade names and the chemical composition and character (i.e. liquid, solid, sludge) of the materials transported to, stored and/or disposed of at the sites by the business organizations listed in the Attachment."
- "6. For each waste material identified above, please give the total volume in gallons for liquids and in cubic yards for solids, for which you arranged disposal and list the dates when disposal occurred and the ultimate destination where disposal occurred."
- "7. Provide copies of all records, including analytical results, and material safety sheets, which indicate the chemical composition and/or chemical character of the waste material(s) transported to, stored, or disposed of at the sites or by the business organizations listed in the Attachment."
- "8. Identify the arrangements made to transport hazardous substances to the sites or the business organizations listed in the Attachment. Identify the type of transportation used (i.e. tankers, dump trucks, drums), and the person with whom such arrangements were made (name, position, company)."

RESPONSE:

All available information in response to Items 2 through 8 have been provided in response to Request No. 1.

* * * * *

- "9. Identify the transporter of your hazardous waste and provide former and current addresses."

RESPONSE:

It is assumed that this request refers to transportation of hazardous waste to sites or facilities listed in the Attachment and therefore, all information has been provided in Request No. 1, it being noted that the available documentation does not identify any hazardous waste having been shipped.

* * * * *

January 7, 1987

- "10. Provide a detailed description of your daily disposal practices with regard to hazardous substances during the relevant time period of 1955 through 1980."

RESPONSE:

Information in response to the Request No. 10 is being prepared although the company reserves all objections it may have to the relevance and breadth of this request.

* * * * *

- "11. Provide a list and description of all liability insurance coverage that is or was carried by you, including any self-insurance provisions that relate to hazardous substances and to the sites listed in the Attachment. Include copies of all these insurance policies."

RESPONSE:

Information in response to the Request No. 11 is being prepared although the company reserves all objections it may have to the relevance and breadth of this request.

Very truly yours,

ACME STEEL COMPANY

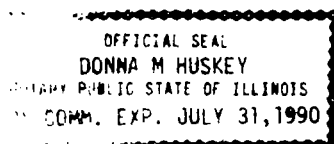
By J. A. DiMauro
Title Director - Engineering

I, J. A. DiMauro, certify that all information contained herein is true and accurate to the best of my knowledge and belief and that a diligent search for all documents responsive to the U.S. EPA request of October 17, 1986, has been completed to the extent indicated herein.

J. A. DiMauro

STATE OF ILLINOIS)
COUNTY OF COOK)

On this 8th day of JANUARY, 1987, before me appeared J. A. DiMauro, the person who signed this instrument, who acknowledged that he signed it on behalf of Acme Steel Company.



Donna M. Huskey
Notary Public

ACME STEEL ACME STEEL COMPANY



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert W. Hickey, Asst. Gen. Con.
Acme Steel Company
13200 South Perry Avenue
Riverdale, IL 60627

RE: Ninth Avenue Dump de minimis Settlement/
Ninth Avenue Dump Site, Gary, IN

Dear Sir or Madam:

This billing invoice is for the recovery of costs incurred by the U.S. Environmental Protection Agency (EPA) for response and oversight activity performed under the authority of the Comprehensive Environmental Response Compensation and Liability Act as amended by the Superfund Amendments and Reauthorization Act of 1986 (CERLA). EPA is due \$1313.09. These costs were incurred for the Ninth Avenue Dump site. The total amount for response costs is (\$318.36); \$98.10 is oversight costs for the Phase I operable unit and \$896.63 is oversight costs for the Phase II operable unit. As stated above this billing is for recovery of government response and oversight activity and any fines and/or penalties due will be billed separately.

This billing notice is being forwarded to you for payment in accordance with the Ninth Avenue de minimis Settlement Consent Decree, Section VI.A.1,7, and 8. Such payment must be made by certified or cashier check made payable to EPA Hazardous Substance Superfund. This payment should be directed to:

Environmental Protection Agency
Region V
Attention: Superfund Accounting
P.O. Box 70753
Chicago, IL 60673

To avoid additional charges, payment must be received at the EPA P.O. Box by April 10, 1991. If you prefer wire transfer--remittance is available. If there are any questions please contact Vanessa Simmons at (312) 353-4885.

To ensure that your payment is properly recorded by EPA, the following information must be included on the face of your payment check:

Ninth Avenue Dump Site Gary, IN
Docket No. V-W-91-C-083
Account No. 1T098
Site No. D2

Any questions regarding this billing should be directed to:

U.S. Environmental Protection Agency
ATTN: Vanessa Simmons
230 South Dearborn - 5MFS-14
Chicago, Illinois 60604

Thank you for your cooperation.

Sincerely yours,

Ivars P. Antens, Chief
Financial Management Branch

Enclosures

cc: Craig Mankowski, 5HSM-TUB-7
Mary E. Butler, 5CS-TUB-3